Section 74.1204 - Statement of Compliance
AM Revitalization Auction 100 FM Translator
Long-Form Application Filing Window
NEW FM Translator Station Facility ID. 202855
Tech Box Proposal FCC File No. BNPFT-20180130ABJ
March, 2018

The instant "Long Form Application for FM Translator in Auction Window 100" is filed in response to the FCC's Public Notice, DA 18-256, Released March 15, 2018, for a new FM translator station to rebroadcast Class B AM station: KDXE, North Little Rock, AR (Facility ID 665). The Public Notice announced a window, open from April 18, 2018, to May 9, 2018, for the filing of FM translator new station construction permit applications for "Tech Box" proposals identified as not mutually exclusive with any other Tech Box proposals from the Auction 100 filing window.

This long-form application specifies a different directional antenna at a slightly lower height but is otherwise identical to the technical facility specified in the Tech Box proposal. Therefore, the instant proposal is a minor change relative to the technical facility in the current Tech Box proposal. Further, the instant long-form application does not create a new conflict to any pending Auction 100 Tech Box proposal, or to any prior-filed Form 349 application. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

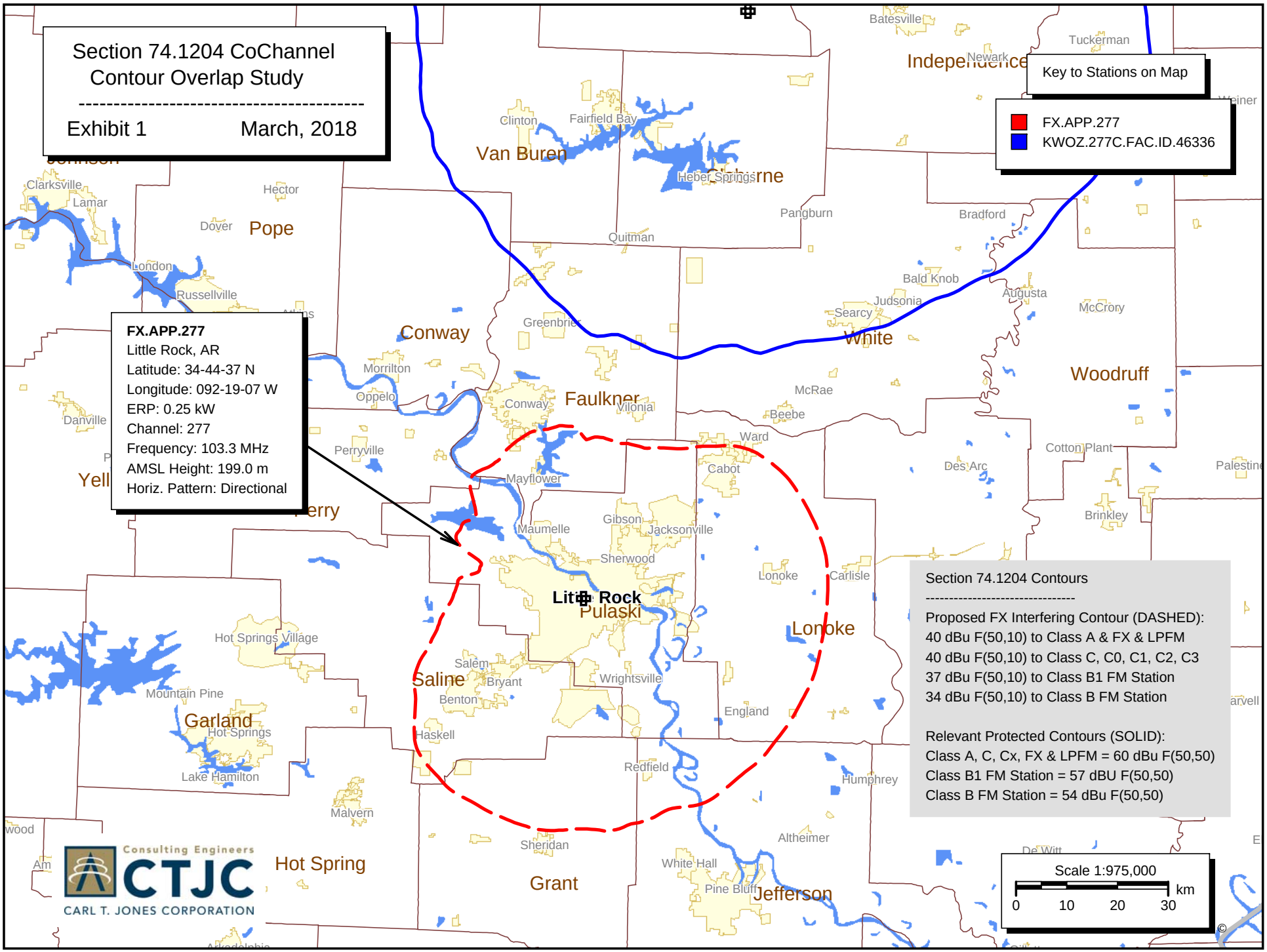
The required protection to second-adjacent channel stations KARN-FM, Sheridan, AR (Channel 275C2) and KABZ, Little Rock, AR (Channel 279C) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein

The proposed transmitting antenna will be located within the protected contour of both stations listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, KABZ is predicted to produce an F(50,50) signal strength of 94 dBu while KARN-FM is predicted to

produce an F(50,50) signal strength of 76 dBu. Therefore, KARN-FM provides for a worst-case interference analysis.

In the vicinity of the proposed translator, the translator's relevant interfering contour is the 116 dBu contour relative to KARN-FM. According to free space calculations, the translator's predicted interfering contour will not reach the ground (See attached Table). Therefore, the instant proposal will cause no interference to any population served by either KARN-FM or KABZ(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".


Section 74.1204 CoChannel
Contour Overlap Study
Exhibit 1
March, 2018
Key to Stations on Map
FX.APP.277
KWOZ.277C.FAC.ID.46336
FX.APP.277
Little Rock, AR
Latitude: 34-44-37 N
Longitude: 092-19-07 W
ERP: 0.25 kW
Channel: 277
Frequency: 103.3 MHz
AMSL Height: 199.0 m
Horiz. Pattern: Directional
Section 74.1204 Contours
Proposed FX Interfering Contour (DASHED):
40 dBu F(50,10) to Class A & FX & LPFM
40 dBu F(50,10) to Class C, C0, C1, C2, C3
37 dBu F(50,10) to Class B1 FM Station
34 dBu F(50,10) to Class B FM Station
Relevant Protected Contours (SOLID):
Class A, C, Cx, FX & LPFM = 60 dBu F(50,50)
Class B1 FM Station = 57 dBU F(50,50)
Class B FM Station = 54 dBu F(50,50)
Scale 1:975,000
km
0
10
20
30
Consulting Engineers
CTJC
CARL T. JONES CORPORATION
Van Buren
Pope
Conway
Faulkner
White
Woodruff
Lonoke
Saline
Garland
Hot Spring
Grant
Jefferson
Pulaski
Little Rock
Batesville
Tuckerman
Newark
Clinton
Fairfield Bay
Heber Springs
Pangburn
Bradford
Quitman
Bald Knob
Judsonia
Searcy
Augusta
McCrory
Clarksville
Lamar
Hector
Dover
London
Russellville
Morrilton
Oppelo
Greenbrier
Conway
Vilonia
McRae
Beebe
Ward
Cabot
Des Arc
Cotton Plant
Brinkley
Palestine
Danville
Perryville
Mayflower
Maumelle
Gibson
Jacksonville
Sherwood
Lonoke
Carlisle
Hot Springs Village
Mountain Pine
Salem
Bryant
Benton
Wrightsville
England
Haskell
Redfield
Humphrey
Lake Hamilton
Hot Springs
Malvern
Sheridan
White Hall
Pine Bluff
Altheimer
De Witt

NEW.FX.277
Little Rock, AR (Facility ID 202855)

ERP 250.00 WATTS

Maximum ERP
0.25 kW

Interfering contour value --------> 116 dBu
RCAGL (m)----------> 74 meters
Antenna Type ----------> 8

Antenna Type 8 = **Nicom, BKG77, 2-bay, half-wave spaced**

Angle Below Horizontal (degrees)	Vertical Pattern (REL. FIELD)	NEW.FX.277 ERP (kW)	NEW.FX.277 ERP (dBk)	NEW.FX.277 Free-Space Distance to interfering contour (meters)	Slant Distance (meters) *	Height of interfering contour above ground **(feet)****	Proposed Interference within 30 ' of ground level?	Horizontal Distance (meters) ***	Horizontal Distance **(feet) *****
0	1.000	0.2500	-6.021	175.4	N/A	242.8			575.4
5	0.988	0.2440	-6.125	173.3	744.6	193.2	No	172.6	566.3
10	0.952	0.2266	-6.448	167.0	373.7	147.7	No	164.4	539.4
15	0.881	0.1940	-7.121	154.5	250.8	111.6	No	149.2	489.6
20	0.791	0.1564	-8.057	138.7	189.8	87.1	No	130.4	427.7
25	0.686	0.1176	-9.294	120.3	153.6	76.0	No	109.0	357.7
30	0.577	0.0832	-10.797	101.2	129.8	76.8	No	87.6	287.5
35	0.463	0.0536	-12.709	81.2	113.1	90.0	No	66.5	218.2
40	0.354	0.0313	-15.041	62.1	101.0	111.9	No	47.6	156.0
45	0.256	0.0164	-17.856	44.9	91.8	138.6	No	31.7	104.2
50	0.174	0.0076	-21.210	30.5	84.7	166.1	No	19.6	64.4
55	0.110	0.0030	-25.193	19.3	79.2	190.9	No	11.1	36.3
60	0.061	0.0009	-30.314	10.7	74.9	212.4	No	5.3	17.5
65	0.028	0.0002	-37.077	4.9	71.6	228.2	No	2.1	6.8
70	0.007	0.0000	-49.119	1.2	69.1	239.0	No	0.4	1.4
75	0.004	0.0000	-53.979	0.7	67.2	240.6	No	0.2	0.6
80	0.008	0.0000	-47.959	1.4	65.9	238.2	No	0.2	0.8
85	0.008	0.0000	-47.959	1.4	65.1	238.2	No	0.1	0.4
90	0.009	0.0000	-46.936	1.6	64.9	237.6	No	0.0	0.0

* Slant distance from antenna center of radiation to location 30 feet (9.1 meters) above ground level at angle below horizontal.

** A negative number indicates that the interfering contour is predicted to reach ground level. If a negative number is present, the interfering contour reaches ground level at the "Horizontal Distance" described below.

*** Horizontal distance from tower base to interfering contour at the indicated height above ground level. If a negative height above ground level is indicated, this horizontal distance is the distance from the tower base to the interfering contour. This horizontal distance is only relevant if the proposed interference is predicted to occur within 30 feet of ground level.